

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF OKLAHOMA**

In re:

Bacone College

Case No. [24-80487](#)  
Chapter 11 Sub V

Debtor.

**OBJECTION TO MOTION TO CONSOLIDATE**

COMES NOW RON BROWN, attorney for Bacone College Development Corporation (“BCDC”) which objects to the *Motion to Consolidate Lead Case 24-80487 with Bacone College Development Corporation* (the “Motion”) filed by Luke Homen, Trustee (“Trustee”). Docket 186. In support, BCDC states as follows:

1. Trustee filed his Motion on June 24, 2025.
2. The Notice of Motion and Hearing filed at Docket 187 provides an objection deadline of July 15, 2025 and set a hearing date of August 13, 2025. Therefore, this objection is timely.
3. BCDC provides this objection and alleges the trustee’s request is not supported by facts upon which the court can/should grant the Motion. BCDC believes many of the facts as asserted by Trustee are inaccurate. BCDC reserves the right to more fully dispute the alleged facts in further pleadings.
4. The Motion is procedurally defective. Because there are other interested parties who may claim an interest in the property owned by BCDC, Trustee’s Motion should have been brought by Adversary Proceeding. Bankruptcy Rule 7001(2).
5. Undersigned counsel will immediately work with Trustee to attempt a resolution of the Motion by agreement, if possible.

6. If such efforts fail, counsel will likely move the court to enter a scheduling order for formal discovery before the court considers the Motion at an evidentiary hearing, move to dismiss the Motion, or file such other pleading(s) or motion(s) as may be necessary.

**WHEREFORE**, BCDC objects to the Trustee's Motion and ask that it be denied.

Respectfully submitted,

/s/ Ron Brown

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